



May 7, 2014

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Permitted Ex Parte Presentation - Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991 CG Docket No. 02-278

Dear Ms. Dortch,

On May 5, 2014, Claudia James on behalf of Ceannate corresponded through email with:

- Mark Stone, Deputy Bureau Chief, Office of the Bureau Chief, FCC Consumer and Governmental Affairs Bureau;
- Kurt Schroeder, Division Chief, Consumer Policy Division, FCC Consumer and Governmental Affairs Bureau;
- Aaron Garza, Attorney Advisor, Office of the Bureau Chief, FCC Consumer and Governmental Affairs Bureau; and
- John B. Adams, Acting Deputy Chief, Consumer Policy Division, FCC Consumer and Governmental Affairs Bureau.

The correspondence provided information relating to a question on skip tracing from Ceannate's April 3rd meeting at the FCC on TCPA.

The email detailed the success rate of reaching student loan borrowers via contact information obtained through skip tracing efforts. Specifically, the email detailed that on average 52% of the accounts placed do not have a number to contact the student loan borrower. In addition, 19% of the numbers on accounts placed have numbers that are invalid. Thus, contact cannot be made with the borrower without skip tracing efforts. Ceannate obtains approximately four numbers per student loan borrower through skip tracing and it takes an average of 13.28 call attempts to make contact with the borrower.

In making these calls, if Ceannate is unaware that any numbers are for cell phones, then they are subject to potential liability under TCPA if they use a predictive dialer to make the call. This potential liability includes calling numbers which were land lines but have been ported to cell phones. Ceannate currently manually calls numbers they know or believe to be cell phones. This practice is inefficient in light of the number of attempts it takes to reach a student loan borrower. Additionally, due to the amount of time this method takes, it further puts a student loan borrower at risk for delinquency and default because of the inability to resolve their debt in a reasonable period of time. In using numbers obtained through skip tracing, approximately 15% of calls to these numbers results in contact with the borrower.

The ability to use a predictive dialer would increase the number of borrowers reached in a given period of time. This heightened efficiency would result in improving the contact rate and the ability to service



more borrowers in a timely fashion, ultimately averting the consequences of delinquent and defaulted loans.

Sincerely,

Claudia James

Claudia James, Principal, Podesta Group

Cc: Mr. Mark Stone
Mr. Kurt Schroeder
Mr. Aaron Garza
Mr. John B. Adams



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